

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Carmelita P. Zarola,	:	Chapter 13 Bankruptcy
	:	
Debtor	:	CASE NO. 5-19-01677
	:	
Toyota Lease Trust,	:	
	:	
Movant	:	11 U.S.C. §362
	:	
vs.	:	
	:	
Carmelita P. Zarola and Joseph Patrick	:	
Zarola (Non-filing Co-debtor) and	:	
CHARLES J. DEHART, III, ESQUIRE,	:	
	:	
Respondents	:	

ANSWER TO
MOTION FOR RELIEF FROM STAY

The Debtor, by and through her counsel, Kevin M. Walsh, Esquire, answers the Motion for Relief from Stay regarding a 2017 Toyota Camry, as follows:

1. Admitted.
2. Admitted.
3. Admitted upon belief, except that the agreement should speak for itself.
4. Admitted. upon belief, except that the title should speak for itself.
5. To the extent any payments may have been missed, it is believed the same were paid current, alternatively, Debtor desires to make up said payments.
6. The arrears amount if not already paid as aforesaid may be true.
7. Denied as stated. Debtor proposes adequate protection in the form of additional payments. This property is necessary for an effective reorganization. Debtor proposes to resolve

any post-petition payments missed by Movant and/or not paid as aforesaid, via amending the plan and or entering into a reasonable stipulation regarding for catch up payments or otherwise.

8. Denied.

WHEREFORE, Debtor respectfully requests that the Motion for Relief from Stay be denied or alternatively reasonably conditioned together with such other and further relief as this court deems just and appropriate.

/s/Kevin M. Walsh

Kevin M. Walsh, Esquire
Attorney I.D. No. 35209
Attorney for Debtor
297-299 Pierce Street
Kingston, PA 18704
(570) 283-3041

CERTIFICATE OF SERVICE

I, Kevin M. Walsh, Esquire, certify that a true and correct copy of the foregoing was forwarded to the below named on the 4th day of September, 2019, as follows:

**Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036**

- **By Clerk's Notice of Electronic Filing**

**James C. Warmbroth, Esquire
Suite 5000- BYN Independence Center
701 Market Street
Philadelphia, PA 19106-1532**

- **By Clerk's Notice of Electronic Filing**

**Carmelita P. Zarola
130 Waller Street
Wilkes-Barre, PA 18702**

- **By U.S. First Class Mail, Postage Prepaid**

/s/Kevin M. Walsh

Kevin M. Walsh, Esquire
Attorney I.D. No. 35209
Attorney for Debtor
297-299 Pierce Street
Kingston, PA 18704
(570) 283-3041